

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil No. 25-00549-CV-W-BP

FORTY-SEVEN (47) PIT BULL-TYPE
DOGS,

Defendants.

NOTICE OF COMPLAINT FOR FORFEITURE

TO: Vinol Wilson
c/o Chekasha Ramsey
Ramsey Law LLC
908 Baltimore, Suite 303
Kansas City, MO 64105
che_ramsey@outlook.com

The enclosed Complaint is sent pursuant to Rule G(4)(b) of the Supplemental Rules of Admiralty or Maritime Claims and Asset Forfeiture Actions.

1. DATE OF NOTICE: July 18, 2025
2. FORFEITURE COMPLAINT: On July 16, 2025, the United States of America filed a civil complaint seeking forfeiture, pursuant to 7 U.S.C. § 2156(e), in the United States District Court for the Western District of Missouri against the defendant Forty-Seven (47) Pit-Bull Type dogs.
3. FILING OF A VERIFIED CLAIM: Pursuant to Supplemental Rule G(5)(a)(ii), in order to avoid forfeiture of the defendant property, any person who asserts an interest in the defendant property **must** file a verified claim within **35** days after the date of this notice or the date of delivery, if personally served.
4. CONTENTS OF VERIFIED CLAIM: Pursuant to Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; and (C) be signed by the claimant under penalty of perjury. *See* 28 U.S.C. § 1746.

5. FILING OF AN ANSWER: If you file a verified claim, you **must** then file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days after filing the verified claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The verified claim and answer **must** be filed with the Office of the Clerk, United States District Court for the Western District of Missouri, 400 E. 9th Street, Kansas City, Missouri, and a copy of the claim and answer or motion must be sent to Leigh Farmakidis, Assistant United States Attorney, 400 E. 9th Street, Fifth Floor, Kansas City, Missouri 64106.

7. Any claim you filed with the seizing agency in an administrative proceeding and any petition you filed in a related criminal action are **NOT** a substitute for the claim you must file in this action which meets the requirements of and within the time allowed under Rules G(4) and G(5), as described above.

Failure to follow the requirements set forth above may result in judgment by default taken against you for relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.

JEFFREY P. RAY
Acting United States Attorney

By: /s/ Leigh Farmakidis
Leigh Farmakidis
Chief, Monetary Penalties Unit
Assistant United States Attorney
400 E. 9th Street, Fifth Floor
Kansas City, Missouri 64106
Telephone: (816) 426-3122
E-mail: Leigh.Farmakidis@usdoj.gov